

REMARKS/ARGUMENTS

Claims 1-20 are pending in this Application.

Claims 1, 5, 6, 9-11, and 16 are currently amended. Claims 4, 13, and 18 have been canceled. Applicants submit that support for the claim amendments and the newly added claims can be found throughout the specification and the drawings.

Claims 1-3, 5-12, and 14-20 are now pending in the Application after entry of this Amendment. No new matter has been entered.

In the Office Action, claims 1-7 and 11-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0215634 to Wakefield et al. (hereinafter "Wakefield"), in view of U.S. Patent Application Publication No. 2002/0078068 to Krishnaprasad et al. (hereinafter "Krishnaprasad"), and in view of U.S. Patent Application Publication No. 2003/0033275 to Alpha et al. (hereinafter "Alpha"). Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Wakefield, in view of Krishnaprasad, in view of Alpha, and in view of U.S. Patent Application Publication No. 2002/0116363 to Grainger (hereinafter "Grainger"). Claims 9-10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Krishnaprasad, in view of Alpha.

Claim Rejections Under 35 U.S.C. § 112, Second Paragraph

The Office Action alleges steps are missing in that it is not clear how a data structure such as table could do such translation. However, the claims do not recited that the table performs the translation, but that the database tables are configured to translate. Applicants respectfully submit that the specification provides several examples of database tables configured to translate a query element to an associated user-identified element in unstructured data.

However, in light of the amendments to the claims, Applicants respectfully traverse the rejections to claims 1, 9-11, and 16 and request reconsideration and withdrawal of the rejections under 35 U.S.C. § 112, second paragraph as allegedly being incomplete.

Claim Rejections Under 35 U.S. C. § 103(a)

Applicants respectfully traverse the rejections to claims 1-20 and request reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) based on Wakefield, Krishnaprasad, Alpha, and Grainger. The Office Action alleges that the combination of references teach or disclose all of the claimed limitations of the corresponding claims and that one having ordinary skill in that art at the time of the invention would have been motivated to incorporate the teachings of Wakefield, Krishnaprasad, Alpha, and Grainger.

Applicants, however, respectfully submit that a prima facie case of obviousness has not been established by the evidence presented in the Office Action. In order to establish a prima facie showing of obviousness, three requirements must be satisfied: all limitations of a pending claim must be expressly or impliedly disclosed by prior art references; there must be a suggestion or motivation in the art for the ordinarily skilled artisan to combine the limitations; and there must be a reasonable expectation of success in making such a combination. (M.P.E.P. § 2143).

Applicants respectfully submit that Wakefield, Krishnaprasad, Alpha, and Grainger, either individually or in combination, fail to teach or suggest one or more of the claim limitations recited in each of claims 1-20.

For example, amended claim 1 recites the feature of “generating a plurality of database tables representing an intermediate index between each query element and at least one of the one or more elements identified as query elements in the unstructured data stored in CLOB format.” The Office Action acknowledges that Wakefield fails to disclose generating a plurality of database tables. Krishnaprasad, however, merely discloses that user may specify what fields are mapped to relational columns and what fields are mapped to CLOBs. Merely mapping fields to CLOBs as in Krishnaprasad does not disclose that a user can identify elements in unstructured data stored in CLOB format as query elements. Krishnaprasad merely indicates that only fields that contain data likely to be queried by a user are mapped to pre-defined relational types, which the rest of the data is lumped together and mapped to one column for CLOBs. (Krishnaprasad: Paragraph [0021]).

Thus, Krishnaprasad fails to disclose identifying elements in CLOBs as query elements as recited in amended claim 1. Krishnaprasad further fails to teach or suggest generating a plurality of database tables representing an intermediate index between each query element and at least one of the one or more elements identified as query elements in the unstructured data stored in CLOB format as recited in amended claim 1.

Alpha fails to cure the deficiencies of Wakefield and Krishnaprasad, and thus Wakefield, Krishnaprasad, and Alpha, either individually or in combination, fail to teach or suggest the feature recited in amended claim 1 of “generating a plurality of database tables representing an intermediate index between each query element and at least one of the one or more elements identified as query elements in the unstructured data stored in CLOB format.”

Furthermore, Wakefield, Krishnaprasad, and Alpha, either individually or in combination, fail to teach or suggest the feature recited in amended claim 1 of “translating a query element associated with a query on the unstructured data based on the plurality of tables to a corresponding element in the unstructured data stored in CLOB format.”

Accordingly, Applicants respectfully submit that amended claim 1 is allowable over the cited references.

Applicants respectfully submit that independent claims 9, 11, and 16 are allowable for at least a similar rationale as discussed above for the allowability of claim 1, and others. Applicants respectfully submit that dependent claims 2-3 and 5-8, 10, 12 and 14-15, and 17 and 19-20 that depend directly and/or indirectly from the independent claims 1, 9, 11, and 16 respectively, are also allowable for at least a similar rationale as discussed above for the allowability of the independent claims. Applicants further respectfully submit that the dependent claims recite additional features that make the dependent claims allowable for additional reasons.

Unless otherwise specified, amendments to the claims are made for the purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof.

While Applicants do not necessarily agree with the prior art rejections set forth in the Office Action, these amendments may be made to expedite issuance of the allowable subject matter. Applicants reserve the right to pursue claims to subject matter similar to those pending before the present Amendment in co-pending or subsequent applications.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

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